MONTANA DEPARTMENT OF PUBLIC HEALTH AND HUMAN SERVICES

TANF/WoRC Work PARTICIPATION SERVICES PLAN (SP)

AS ADMINISTERED THROUGH THE

WORK READINESS COMPONENT (WoRC)

FOR

______________ COUNTY/COMBINATION

FOR STATE FISCAL YEAR 2007

INTRODUCTION

TANF Participation Services (aka WoRC) is a transitional program developed to provide support and guidance to participants as they enter into work/employment. WoRC is instrumental in providing opportunities to participants as they transition from receipt of cash assistance to employment and eventual freedom from dependence on government benefits.

Special emphasis is placed on strength based case management that focuses on placing participants into employment or a work experience site based on a good assessment and referral process, documentation of that process with specific outcomes/results, and supportive services to assist in the process.

Strength based case management is a participant-centered process for identifying participant employment needs and assisting the person to connect with the appropriate resources. The participant's strengths are the foundation for developing a realistic action plan to assist the household in achieving an immediate work goal and long-term self-sufficiency plan.

Action plans and setting timeframes for participant success are critical. What is made apparent in the assessment, observation and interviewing MUST become part of the participant's Self Sufficiency Plan and activities. Assessing individual differences including cultural or geographical differences must be addressed as to how they impact employment. Employment placements and a solid work experience placement system must be developed in order for participants to enter employment.

WoRC is a TANF program and TANF policy as put forth in the TANF policy manual must be followed.

TANF Work Readiness Component (WoRC)
Participation Services and Mandatory Related Activities

The current totals of federally required participation hours are 30 hours per week for single parent families and 35 hours per week for two-parent families. These limits are subject to change by state or federal regulations.

I. Primary Work Participation Allowable Work Activities

This service is required for every TANF applicant/participant. The goal of this element is paid employment. Single parents need to be participating in one or a combination of these activities for 20 hours each week. Each adult in a two-parent family must participate in one or a combination of these activities for 30 hours per week. Secondary activities may take place for up to 10 hours a week for single parents and 5 hours a week for each adult in a two-parent family. The primary allowable activities that <u>must be offered</u> under this element are limited to any combination of the following:

A. Unsubsidized Employment- Employment is the goal of this program. Placement in work for any hours counts toward the 20 or 30-hour total each week. Explanation of the Earned Income Tax Credit (EITC) and assistance in applying for such are part of this activity.

- Describe how you will develop job opportunities for this activity in your primary community as well as outlying areas.
- Describe any partnerships you have or will develop to assist individual participants in gaining work history and/or employment.
- Describe how you will provide EITC explanations and application assistance.

B. Work Experience (WEX)

Being assessed for, prepared for and oriented into a worksite in order to gain useful training and experience, which can cross over into employment are the goals of this component. The following procedures comprise the WEX component: WEX Assessment, WEX Preparation, WEX Orientation, WEX onsite placement (initial and ongoing)

- **WEX assessment** incorporates all assessments that would lead to determining work experience and employment capabilities or unemployability. This may include initial assessment of job skills and interests for those new to TANF and continued assessment for ongoing TANF participants to enhance placement into employment. WoRC programs are encouraged to network with local and/or nearest larger community resources to provide assessment referrals and resources.
  - List the types of assessments and interest inventory tools to be used to properly assess participants to promote appropriate job matches. Include names of assessments and interest inventories and other approaches to be used. Explain how often each is used and how that is determined.
  - Explain your follow-up and documentation process to ensure that what is revealed in an assessment is addressed in the Employability Plan.
- **WEX preparation -** Any activity that assists the participant in becoming job ready may be part of this element.
  - Explain all WEX preparation activities to be offered.
- **WEX Orientation** – introducing participant to work site(s), interview processes, etc.
  - Explain what services will be offered under this element.
- **WEX Placement**-placement at actual work site.
  The spectrum of WEX sites developed may offer two levels or tiers: 1) to develop proper workplace behavior and, 2) to develop or learn certain specific skills. The levels may exist at the same site or may require the participant to move through sites as they advance their skills and training levels. It is <u>mandatory</u> to monitor all WEX sites or placements monthly through a face-to-face visit with the site supervisor. Phone contact should occur at least every other week between such face-to-face visits. Worker's Compensation for a person placed in this element is covered by DPHHS. Examples of tiered sites are:
  Level one – Clothes sorter at a charity organization such as Goodwill; recycling pick-up route assistant or similar activities. The purpose of this level is basic employment readiness: showing up on time; wearing presentable attire; taking basic instructions, following directions, etc.
  Level two – Clerical or data entry; reception work; other basic office, store or basic manufacturing skill development. The purpose is to learn or enhance skills that can be used in the first job or job advancement.
  - Describe how employer or WEX site/participant matches are done including any assessments completed as part of the matching process.
  - Describe how WEX sites will be developed for each tier and how they will be monitored monthly within your service area.
  - Explain how you might use this component to assist a participant in documenting potential restrictions and limitations as part of the SSI process.

C. Community Service Programs

This is a participant driven activity. Participants can volunteer in a recognized volunteer agency and position. It is the participant's responsibility to locate a site and report participation hours that are verified. Workers' Compensation is not available for participants at self-directed volunteer sites. Use of this component is limited. It is to be used to fill primary hours when other activities do not meet the full 20 or 30-hour requirement. It may also be used when absolutely no other work activities are available or appropriate. Monitors will be reviewing this component to ensure limited use.

- Describe how you will monitor this activity both for participant hours and limited use.
- Explain how you might use this component to assist a participant in the SSI process.

II. Limited Primary Activities - Under current TANF law, certain activities may be designated as primary activities (though not actual work), which count toward the first 20 or 30 hours of participation each week. These activities, however, are time limited.

A. Job Search/Job Readiness – This activity is important as it assists participants in obtaining employment, which is the TANF goal. Any activity that assists the participant in becoming job ready may be part of this element**. This component cannot exceed 6 weeks in any federal fiscal year and no more than 4 such weeks can be consecutive**. **One hour of job search in any week is counted as a complete week of job search for federal reporting purposes,** so this component must be used wisely and to the participant's maximum advantage. Each case manager must manually track the history of this component for each participant in order to have the information needed for appropriate scheduling.

- Explain what activities you will include in this component and how your agency will provide such activities.
- Explain how you will decide if it is an appropriate time to utilize this component (due its limits).
- Limits are tracked on TEAMS, but no history is recorded. An error message appears when this component is input and the limited weeks have already been used. Explain how you will monitor and track locally to benefit participant planning.

B. Vocational Education Training/Short Term Training – This component includes any education beyond high school that is a short-term training or less than a bachelor degree. There is a 12-month lifetime limit for any individual in this activity. Each case manager must manually track the history of this component for each participant in order to have the information needed for appropriate scheduling**.**

- Explain how you evaluate a participant's action plan; stated goals or self-sufficiency plan to make sure the planned education leads to employment.
- Explain how you will counsel participants to use this year to their advantage.
- Limits are tracked on TEAMS, but no history is recorded. An error message appears when this component is input and the limit has been used. Explain how you will monitor and track locally to benefit participant planning.

Secondary school attendance or course of study leading to certificate of General Equivalences also known as education directly related to employment – To count as a primary activity, this component **is ONLY available** to individuals **under 20 years of age without a high school diploma or GED certificate.**

- Please indicate how you will provide these services, monitor attendance and track. Please describe any partnerships you have to assist participants in achieving their high school diploma or GED certificate.

III. **Secondary Work Participation Activities –** These activities can only be used as secondary activities to complete the final ten (10) hours of the required 30 hours per week for single parents and the final five (5) hours of the 35 hours a week for two-parent families. **<u>The above noted primary work activities must take place for 20 or 30 hours each week in order for any hours to count in the federal participation reporting.</u>**

A. **Job Skills Training directly related to employment** – The activities in this component may be college courses not considered to be part of the 12 month vocational education limit, computer classes, STEPS, Parents as Teacher classes or any other activity that is not considered WEX preparation and gives education or training that might assist a person in becoming employed.

- Explain what activities you plan to provide under this component.
- Explain how you will track and limit hours to those after the initial 20 or 30 hours of work participation.

B. **Adult Basic Education or Literacy Activities -** Education directly related to employment, OR satisfactory attendance at a secondary school or in a course of study leading to a GED. **This activity is limited to individuals who are 20 years of age or older AND do not have a GED or High school diploma.** If a person already has a **GED** or high school diploma and needs additional education or retraining, these activities must be placed under WEX or Job Skills Training (as above) and must be limited.

- Explain how you provide this activity as a secondary activity to only those eligible for it. Please describe any partnerships you have to assist participants in achieving their high school diploma or GED certificate.
- Explain how you will document and track the activity and limited hours.

While SSI related services are not a primary or secondary allowable activity in the present form, the services may still be provided as part of a person's self-sufficiency plan. Assisting TANF participants in the navigation through the complex SSI process might be done through a WEX component or use of Community Service to prove or disprove a physical or mental condition qualifying the individual for SSI. Your assistance will be required in:

- Filling out the initial application (include researching phone numbers, getting records and verifying appointments);
- Appointment Assistance (arranging transportation, if necessary, and following up on participants' attendance at required appointments). Appointments may include legal process appointments required by SSA as well as appointments for assessments and follow-up visits.

- Assisting Disability Determination Services (face-to-face assistance, assisting participants in obtaining medical records or getting appointments, assisting participants through the SSI process in a manner that meets the timelines and deadlines of SSA).
  - ➢ Please describe the activities you will use to assist participants in the SSI process.
  - ➢ Please explain how you will coordinate services with Disability Determination Services and Social Security Administration.

IV. Participation Management Services– Ongoing for each participant.

A. Case management

1) **Alternative contact methods, sites, and hours:** It is imperative that WoRC provides services and coordinates services when and where they are needed. Activities and services must be available during hours the participants can access them. Outreach to remote sites should occur to develop WEX sites, contact participants and provide services. Alternate contact methods and service provision are expected as necessary. Meeting participants in neutral surroundings to investigate good cause or personal barriers is recommended. Home visits are required where safety is not a concern.
2) **Formal collaborative efforts** – The Sanction Intervention/Prevention Activities are mandatory activities. Collaborative efforts with all other associated community caseworkers, including OPA, for provision of potential resources must occur regularly and always occur in crisis situations. Appropriate information releases must be signed and in place before information is exchanged.
3) **Supportive services -** Supportive services must be available for all scheduled activities as needed by participants. You must continue to coordinate supportive services with your local OPA as they may still give supportive services to those enrolled in Tribal Native Employment Works (NEW). Expenditures for all county issuances need to be tracked so both the OPA and WoRC know remaining balances each month.
4) **Case management services -** Ongoing weekly face-to-face case management for each participant is required with alternative arrangements accepted when appropriate. Case management may include the brokering of resources for the participants. Referrals to other services will include follow-up to insure that contact was made and timely and appropriate services were addressed by the outside agency.
5) **Self-sufficiency plan** – For every person who is served by WoRC and has been on TANF for at least six months, a self-sufficiency plan (SSP) must be developed, regularly updated and thereafter, followed. The SSP is the long-range plan for how the participant is going to support the household once TANF benefits end. The SSP identifies the goals and then outlines the steps and timeframes for achieving each goal. The SSP steps are detailed in the participant's Employability Plan.
6) **System and Data requirements –** It is a requirement that the contractor be able to access The Economic Assistance Management System (TEAMS) to record and track WoRC participation, activities, supportive services and other elements as necessary. The WoRC Contractor Guidelines will detail which activities must be tracked and how to track them. The Department has furnished WoRC computers and printers for case managers directly affiliated with WoRC data input case management. Should operators change, the equipment must be transferred to the new operator unless otherwise

negotiated. Additional computers may be purchased by a contractor, but must meet all Department standards and regulations.

7) **Conciliation and Sanction** must be provided per the TANF manual and WoRC Guidelines.
8) **Coordination with Diversion projects and other TANF funded programs** aimed at moving participants into employment is required.
9) **Childcare information and referrals will be provided in accordance with Department policy and WoRC guidelines.**
10) All case managers must receive HIPAA training and must be informed of all the confidentiality requirements of both DPHHS and the contracting entity.

Please sign below indicating that you agree to abide by and provide all of the above per TANF manual and Contractor Guidelines.

____

Name   Title   Date

SERVICES PLAN BUDGET

Administrative costs may not exceed 15% of total expenditures. Indirect cost limitations, fiscal accountability and audit procedures must be documented and verified per Generally Accepted Accounting Principles (GAAP).

Please fill out the budget worksheet and supply the narrative and other materials as indicated below:

A **PROJECT OPERATING PLAN NARRATIVE** must accompany the Budget Worksheet. It must include:

> **Personal Services –** Individually list the position titles, number and percentage of full time equivalent positions for each position title and what the position does in the program. List the salary and total benefits to be charged to WoRC for each position. Do not include any personnel for which you have a subcontract. Please list the name, address and phone number of the financial officer or other responsible fiscal person designated by your organization. Follow the directions below to determine if a person's time should be counted as administrative cost or program cost.
>
> **Operating Expenses -** Indicate all operating expenses on the Budget Breakdown worksheet. Examples of operating costs are rent, utilities, supplies, and phone. If you subcontract for any portion of the program, include those expenses as a separate line on the Budget Breakdown worksheet. Explain what portion of the program is subcontracted, any personnel supplied through the subcontract and indicate the cost of the subcontract in the "Additional Narrative" section following the budget. Copies of the subcontract must be submitted to the PAB Contract Officer as per your contract. Refer to **Attachment A of the contract** for contractor's accountability and responsibilities pertaining to the services provided reimbursement requirements, updating inventory lists and sub-contracts requirements.

REMEMBER: Administrative costs for the entire contract, including sub-contracts are limited to a total of 15% of contract expenditures.

Detailed Budget Instructions - Please ensure the following information is given as part of your detailed narrative or as separate budget listing:

Please submit a <u>detailed budget</u> specific to administrative and program costs. This detailed budget must show what percentage of the budget is proposed for administrative costs and what specific areas (personnel costs by position, rent, materials, etc.) apply to administration.

In reference to section (1)(i) of the TANF rules and Regulations (45 CFR, 263.0), costs associated with direct delivery of services are "program" costs. Such costs might include:

-Local office costs, i.e. Job Service or HRDC local office or program office costs of staff, space, travel, etc. associated with the WoRC program, diversion program, co-location situations, and services provided by such staff

> -Staffing costs for direct service staff and those providing direct supervision and clerical support to direct service staff
>
> -Travel, supplies, space, etc. related to staff as identified above

In reference to section (2) of the TANF rules and Regulations (45 CFR, 263.0), "**administrative**" costs would include the examples below:

-Central office, centralized service staff, or centralized functions such as legal, payroll, personnel, IT, etc. which are organized centrally to provide support to local offices or local program operators

-Travel, supplies, space, etc. related to centralized office or central service staff

Knowing that some agencies are large enough to have developed centralized services, functions, or staffing that support a number of various programs, it seems clear that these indirect costs that contracts inherently have should be reported as administrative costs. Other programs may be very small, and do not have centralized or indirect costs. In that case, all or nearly all of the contract costs may be designated as program costs.

Program:

- **Staffing costs for direct service staff and those providing direct supervision and clerical support to direct service staff.**

a) The time spent providing direct supervision of the staff providing direct client services for the TANF program(s) must be documented on timesheets.

b) The time spent providing clerical support to the staff providing direct client services for the TANF program(s) must be documented on timesheets. In order for these costs to be considered program costs they must be a direct cost to the program and cannot be included in the allocation pool or indirect costs.

c) Travel, supplies, space, etc. for direct service staff and those providing direct supervision and clerical support to direct service staff for their time spent in TANF funded programs will be a program expense. These expenses may also include outreach or communications for the TANF programs i.e. newspaper advertisements for remote program locations and appointments.

d) Auto Insurance for those providing direct service staff and those providing direct supervision and clerical support to direct service staff will be a program expense for the time vehicles are used for WoRC or other TANF funded programs.

Administrative:

Central office, centralized service staff, or centralized functions such as legal, payroll, personnel, IT, etc. which are organized centrally to provide support to local offices or local program operators

- **Travel, supplies, space, etc. related to centralized office or central service staff**
- **Remember: administrative costs are capped at 15% of contract expenditures**

a) For those contractors large enough to have more than one program and thus a central structure, the centralized functions, such as but not limited to; legal, payroll, personnel, IT, fiscal, agency directors, purchasing agents, agency communications or agency outreach, contracting officer, and indirect clerical support are administrative expenses.

b) For small contractors who do not have a central office or centralized functions, the following activities are an example of administrative costs; financial activities and IT support for financial activities, general or centralized Human Resource activities, or indirect clerical support.

c) TANF related travel, supplies, space, etc. for centralized functions or central service staff is an administrative expense.

d) Auto Insurance for those providing centralized functions relating to the TANF program(s) is an administrative expense.

e) General Liability Insurance is an administrative expense.
f) Administrative expenses must be based on actual expenditures and must not exceed 15 percent of the expended contract.

These guidelines are strictly guidelines and do not take precedence over the contract or the TANF regulations.

The contractor shall:

1. Not transfer funds between the TANF-WoRC program, FSET Program and FSET Supportive Services line items as they are individually funded and listed as such in the body of the contract.
2. Not transfer funds in any manner or from any item, category or line that will cause administrative costs to exceed 15% within each TANF funded program.
3. Seek approval in writing from the Department before transferring funds equaling 10% or more of the total of any of the following: Personnel Services, Operating Expenses or Equipment categories. A budget amendment will be requried if the transfer is approved.
4. Notify the Department in writing within thirty (30) calendar days of the transfer of funds of less than 10% of the total in any of the following: Personnel Services, Operating Expenses or Equipment categories if they impact services.

FOR REIMBURSEMENT PURPOSES: TIME SPENT BY CASE MANAGERS, SUPERVISORS AND OTHERS MUST BE TRACKED BY ACTIVITIY FOR BILLING PURPOSES. Please see the reimbursement form and instructions.

For purposes of this Plan and the contract the word commingle means:
Commingle means funds that are blended with other funding sources, and not kept segregated. For purposes of this contract, TANF and/or MOE funds must be segregated for expenditure and accounting purposes. Separate records must be kept that identify the source and application of funds for federal and state sponsored activities. The records must be supported by source documentation.

TANF FUNDS CANNOT BE COMINGLED WITH ANY OTHER MONIES FOR ANY PURPOSE.